

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JEFFREY SMITH,

Plaintiff,

v.

C.A. No. 1:19-cv-00360-RGA-SRF

TOWN OF DEWEY BEACH,  
DELAWARE, MAYOR T.J. REDEFER,  
Individually and in his official capacity as  
Mayor of Dewey Beach, Delaware,  
SGT. CLIFFORD DEMPSY, individually,  
LARRY SILVER, individually,

Demand for Jury Trial

Defendants.

**OFFER OF JUDGMENT**

TO: Stephen P. Norman, Esquire  
The Norman Law Firm  
30838 Vines Creek Road, Suite 3  
Dagsboro, DE 19939

**PLEASE TAKE NOTICE** that Defendants, Town of Dewey Beach, Delaware, Mayor T.J. Redefer, Individually and in his official capacity as Mayor of Dewey Beach, Delaware, Sgt. Clifford Dempsey, Individually and Larry Silver, Individually, hereby offer to allow judgment to be taken against them pursuant to Rule 68 of the Federal Rules of Civil Procedure as follows: a judgment in favor of Plaintiff Jeffrey Smith and against Defendants Town of Dewey Beach, Delaware, Mayor T.J. Redefer, Individually and in his official capacity as Mayor of Dewey Beach, Delaware, Sgt. Clifford Dempsey, Individually and Larry Silver, Individually, jointly and severally, in the sum of \$25,000.00 (twenty-five-thousand dollars and zero cents) plus costs

accrued to date (including reasonable attorneys' fees) in an amount to be determined by the Court, in exchange for full satisfaction and release of all of Plaintiffs' claims in his prayer for relief against these Defendants in the above-captioned action.

This offer shall remain open for fourteen (14) days, after which it shall be deemed withdrawn with the full force and effect remaining as provided by F.R.C.P. 68.

Respectfully submitted,

MARGOLIS EDELSTEIN

By: /s/ Herbert W. Mondros  
Herbert W. Mondros, Esq. (#3308)  
Diane M. Coffey (#200001)  
300 Delaware Ave., Suite 800  
Wilmington, DE 19801  
(302) 888-1112

Dated: September 26, 2019

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FOR THE DISTRICT OF DELAWARE**

JEFFREY SMITH,

Plaintiff,

v.

C.A.No.1:19-00360-RGA-SRF

TOWN OF DEWEY BEACH, DELAWARE,  
MAYOR T.J. REDEFER, Individually and in his  
official capacity as Mayor of Dewey Beach,  
Delaware, SGT. CLIFFORD DEMPSEY,  
Individually, LARRY SILVER, Individually,

Demand for Jury Trial

Defendants.

**Certificate of Service**

The undersigned hereby certifies that a true and correct copy of the foregoing was served  
on Stephen P. Norman, via U.S. Mail and email on September 26, 2019.

MARGOLIS EDELSTEIN

By: /s/ Diane M. Coffey

Herbert W. Mondros, Esq. (#3308)  
Diane M. Coffey (#200001)  
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